## COMMONWEALTH OF MASSACHUSETTS

## DEPARTMENT OF TELECOMMUNICATIONS & ENERGY

	)	
Investigation by the Department on its own motion,	)	
pursuant to G.L. c.159 § § 12 and 16, into the	)	
collocation security policies of Verizon New	)	D.T.E. 02-8
England Inc. d/b/a Verizon Massachusetts	)	
	)	

## AFFIDAVIT OF LYNELLE RENEY

- I, Lynelle Reney, being first duly sworn, depose and state as follows.
- 1. I am the same Lynelle Reney who testified as a member of Verizon Massachusetts' ("Verizon MA") witness panel at the hearings in this matter on July 10-12, 2002. My title, duties, and other background information are set forth in Ex. VZ MA 1, p. 8.
- 2. I make this affidavit to respond to erroneous information provided by AT&T in its response to record request RR-VZ-2, filed on or about July 26, 2002. Specifically, I wish to correct AT&T's misstatement that AT&T established a virtual collocation arrangement outside of Massachusetts "because no physical [collocation] was available at the time it was ordered."
- 3. To the contrary, in connection with a virtual collocation arrangement in a New England state other than Massachusetts, which is operational today, AT&T voluntarily requested virtual collocation when it established the arrangement.
- 4. Verizon received an application from AT&T to establish this virtual collocation arrangement in November 1998. Verizon can locate no record of any application for physical collocation from AT&T for that central office.

5.	Verizon	has	been	provisioning	physical	collocation	in	that	New	England	central
office continuously since 1994.											
					Lynelle l Director	Reney					
Common County of		Mass	achus	etts							
Before me this 1 <sup>st</sup> day of August, 2002, appeared Lynelle Reney, who made oath that the foregoing statements are true to the best of her knowledge and belief.											
					Notary P My Com	ublic mission Exp	ires	S:			